

EXHIBIT A

Kilgannon, John C.

From: Kilgannon, John C.
Sent: Wednesday, April 20, 2016 9:52 AM
To: DiDonato, Edward J. (EDiDonato@foxrothschild.com); Tom Muldoon (tpm@fsm-law.com)
Cc: Kilgannon, John C.; Daniel M. O'Donnell (DODonnell@maloneylawoffice.com)
Subject: Campisi Construction Settlement Documents - FRE 408
Attachments: 1409916_4.docx; 1410187_1.docx

Ed and Tom:

Pursuant to my earlier emails and subject to FRE 408, I am forwarding a draft Settlement Agreement and Settlement Motion. Please note that my client reserves the right to make any revisions or amendments.

You will note that the payment structure was altered slightly at my client's request. I understand that Cornerstone's cash flow has changed over the past several months and, as such, Cornerstone asked that the initial payment be slightly modified to \$70,000 with two remaining installments of \$15,000 as specified in the draft.

Also, as I mentioned in my prior email, after the settlement is consummated, Cornerstone wants to avoid further litigation over a claims objection. Hence, I added language dealing with the claim issue. This issue may be moot if the Trustee does not anticipate distributions to unsecureds or it may be significant if distributions are expected. In any event, we can discuss the claim issue further.

Lastly, you will note that the settlement motion/order contemplates the issuance of an injunction under section 105 as a settlement bar against future claims.

Please let me know if you have any questions or comments.

Thanks

John

John C. Kilgannon
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